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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

STEPHEN CAMPA

Plaintiffs,

v.

BOARD OF TRUSTEES OF THE SHEET
METAL WORKERS PENSION PLAN OF
NORTHERN CALIFORNIA; BENESYS,
INC.

Defendant.

) Case No.: 3:23-cv-1760-MMC
)
) **NOTICE OF CLASS ACTION**
) **SETTLEMENT AND STIPULATION**
) **REGARDING PRELIMINARY**
) **APPROVAL; ~~PROPOSED~~ ORDER**
) **GRANTING STIPULATION AS MODIFIED**
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To the Court, all parties, and counsel of record: Please take notice that the parties have reached a settlement in principle as to all the claims asserted in this matter on behalf of the proposed class and accordingly stipulate as follows:

STIPULATION REGARDING PRELIMINARY SETTLEMENT APPROVAL

WHEREAS, the operative complaint in this matter was filed on April 12, 2023, and the parties subsequently stipulated to stay Defendants' response to the complaint and case management

1 conference in order for the parties to exchange the information necessary to pursue an early mediation
2 to explore possible settlement;

3 WHEREAS, the parties, along with other interested entities, attended a mediation on December
4 7, 2023 which, after subsequent mediator-assisted negotiation among all interested parties, resulted in
5 a settlement in principle of the claims asserted in this matter on February 13, 2024;

6 WHEREAS, the Court has set a deadline of March 6, 2024 for the parties to submit a joint
7 mediation report and for Defendants to respond to the operative complaint;

8 WHEREAS, the settlement in principle is subject to the Court's approval under Federal Rule of
9 Civil Procedure 23;

10 WHEREFORE, the parties hereby stipulate to the following:

11 1. To request that the Court vacate the March 6, 2024 deadline for the parties to submit a
12 joint mediation report and for Defendants to respond to the operative complaint, and that the deadline
13 for Defendants to respond to the operative complaint be stayed pending the Court ruling on the parties'
14 forthcoming motion for preliminary approval of their settlement.

15 2. To request that the Court enter a scheduling order for settlement approval with the
16 following deadlines:

- 17 • **Deadline to Finalize Proposed Written Settlement Agreement:** April 11, 2024
- 18 • **Deadline for Class Counsel to File Motion for Preliminary Approval and Class**
19 **Certification:** April 18, 2024
- 20 • **Hearing on Motion for Preliminary Approval:** May 10, 2024, or as soon thereafter as
21 the Court is available.

22 The motion for preliminary approval will contain a proposed schedule for mailing notice of the
23 settlement, deadlines to submit objections, and a schedule for filing a motion for final approval and
24 conducting a fairness hearing.

25 IT IS SO STIPULATED.
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2 Dated: March 7, 2024

LITTLER MENDELSON P.C.

3
4 By: /s/ Wesley Stockard
5 Wesley Stockard
Attorneys for Defendant BeneSys, Inc.

6 Dated: March 7, 2024

GROOM LAW GROUP, CHARTERED

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8 By: /s/ Lars C. Golumbic
9 Lars C. Golumbic
10 Attorneys for Defendant Board of Trustees of the
11 Sheet Metal Workers Pension Plan of Northern
12 California
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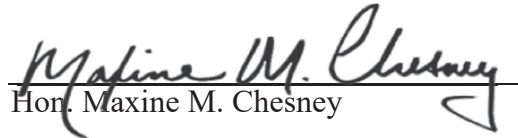
PROPOSED ORDER APPROVING STIPULATION

The Court, having considered the submission of the parties and good cause showing hereby GRANTS the stipulation regarding preliminary settlement approval. The March 6, 2024 deadline to file a joint mediation report and for Defendants' to respond to the complaint is vacated, and the deadline for Defendants to respond to the operative complaint is stayed pending the Court ruling on the parties' forthcoming motion for preliminary approval of their settlement. The parties shall seek preliminary approval of the proposed settlement on the following schedule:

- **Deadline to Finalize Proposed Written Settlement Agreement:** April 11, 2024
- **Deadline for Class Counsel to File Motion for Preliminary Approval and Class Certification:** April 18, 2024
- **Hearing on Motion for Preliminary Approval:** May 10, 2024 24, 2024, at 9:00 a.m.

May 8, 2024

Dated


Hon. Maxine M. Chesney

United States District Judge